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REMARKS

Applicants' representative notes with appreciation the clarification by the Examiner that the Office Action erroneously refers to the secondary document, Chatterjee *et al.*, by Patent Number US 6,430,538 B1, and that the intended citation is to Chatterjee *et al.* (US 5,774,661). Accordingly, the following comments are predicated on the foregoing clarification.

Claims 2-17, 19-26, 28 and 29 are currently pending in the subject application and are presently under consideration. Claims 2, 4, 11, 17, 23 and 29 have been amended to further emphasize novel feature of applicants' claimed invention, and claims 3, 5-10, 12-16, 19-22, 24-26 and 28 have been amended to cure a minor informality. A version of all pending claims is found at pages 2-7. Favorable consideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 2-17, 19, 21-26 and 28-29 Under 35 U.S.C. §103(a)

Claims 2-17, 19, 21-26 and 28-29 stand rejected under 35 U.S.C. §103(a), as being unpatentable over Ohmura *et al.* (US 6,151,583) in view of Chatterjee *et al.* (US 5,774,661). Withdrawal of this rejection is respectfully requested for at least the following reasons. Ohmura *et al.* and Chatterjee *et al.*, either alone or in combination, fail to teach or suggest each and every limitation set forth in the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) *must teach or suggest all the claim limitations*. See MPEP §706.02(j). The *teaching or suggestion to make the claimed combination* and the reasonable expectation of success *must be found in the prior art and not based on the Applicant's disclosure*. See *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (emphasis added).

Applicants' claimed invention relates to a computing workflow system having

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process definition represented in a workflow table. In particular, independent claims 2 and 23 recite: *creating a data table in a server database ... creating a workflow table as part of a database schema in the server database*, and independent claims 4, 11, 17 and 29 recite: *a server database that includes a data table and an associated workflow table, the data table includes workflow triggers, the workflow table comprises at least part of an extended database schema*. Neither Ohmura *et al.* nor Chatterjee *et al.* teach or suggest these novel aspects of the invention as claimed.

Ohmura *et al.* relates to a workflow management system and a document circulation method in a workflow system, and in particular, to a hierarchical workflow management system suitable for changing a circulation route during document circulation. The Examiner asserts that Ohmura *et al.* provides the aforementioned limitations at col. 8, lines 16-30, col. 5, lines 38-56 and claim 28. Applicants' representative respectfully disagrees. Ohmura *et al.*, at the passages and claim noted, fails to provide a server database within which a data table and a workflow table is either created or stored. Nowhere in Ohmura *et al.* is there mention of a database, let alone a server database within which tables are stored. All that is realistically suggested in the cited document is that a workflow server stores information in a process table and a work management table. Whether Ohmura *et al.* stores information in process and work management tables that comprise a server database as would be understood by one ordinarily skilled in the art is not disclosed in the cited document. It is submitted that merely storing and/or creating tables without providing an indication of where the tables are stored and/or created does not impute that the tables are necessarily stored/created in a server database; in fact it would not strain the bounds of reasonableness to posit that Ohmura *et al.* stores the tables in flat files on a local hard disk associated with the disclosed workflow server, and that merely storing tables to local hard disk is not an indication that the cited document is utilizing a database as would be generally understood by persons ordinarily skilled in the art.

Moreover, the subject claims recite that *the workflow table*, in addition to being created in a server database, is also *part of an extended database schema*. Ohmura *et al.* is silent with regard this novel claim limitation. Nowhere in Ohmura *et al.* is this claimed aspect either taught or suggested.

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Additionally, the Examiner acknowledges that Ohmura *et al.* is deficient in failing to teach or suggest all the claim elements recited in the subject independent claims, and thus attempts to utilize Chatterjee *et al.* to cure the deficiencies rendered by Ohmura *et al.* Chatterjee *et al.* discloses systems and methods for controlling diverse applications in a workflow without custom programming through a user interface. While Chatterjee *et al.* utilizes a database for the purposes of effectuating database queries, like Ohmura *et al.*, the cited document fails to provide for the creation of tables in the server database, or provide indication that a data table and an associated workflow table are included in the server database. Further, Chatterjee *et al.* makes no mention of the fact that a workflow table forms part of an extended database schema. Thus, it is believed that neither Ohmura *et al.* nor Chatterjee *et al.*, either individually and/or in combination, make obvious the invention as claimed, and accordingly that the rejection of claims 2, 4, 11, 17, 23 and 29 (and claims that depend there from) should be withdrawn.

II. Rejection of Claim 20 Under 35 U.S.C. §103(a)

Claim 20 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Ohmura *et al.* (US 6,151,583) in view of Chatterjee *et al.* (US 5,774,661), and further in view of Haverstock *et al.* (US 2002/0038357 A1). This rejection should be withdrawn for at least the following reasons. Claim 20 depends from independent claim 17; and Haverstock *et al.* does not overcome the aforementioned deficiencies of Ohmura *et al.* and Chatterjee *et al.* with respect to claim 17. Accordingly, withdrawal of the rejection of claim 20 is respectfully requested.

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CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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